



State of Utah

Department of  
Environmental Quality

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*Executive Director*

DIVISION OF AIR QUALITY  
Richard W. Sprott  
*Director*

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*Lieutenant Governor*

DAQE-IN0677002-04

March 5, 2004

Tom McCormick  
Health, Safety & Environmental Manager  
Rocky Mountain Pipeline System LLC  
1575 Highway 150 South  
Suite E  
Evanston, Wyoming 82930

Dear Mr. McCormick:

Re: Intent to Approve: Construction and Operation of a New Storage Tank, Summit County  
CDS B; ATT; NSPS; HAPs; Title V Minor  
Project Code: N0677-002

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Enqiang He. He may be reached at (801) 536-4010.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section

RR:EH:re

cc: Summit County Public Health Department

**STATE OF UTAH**

**Department of Environmental Quality**

**Division of Air Quality**

**INTENT TO APPROVE: CONSTRUCTION AND OPERATION  
OF A NEW STORAGE TANK**

**Prepared By: Enqiang He, Engineer  
(801) 536-4010  
Email: [che@utah.gov](mailto:che@utah.gov)**

**INTENT TO APPROVE NUMBER**

**DAQE-IN0677002-04**

**Date: March 5, 2004**

**Rocky Mountain Pipeline System LLC**

**Source Contact  
Tom McCormick  
(307) 783-8336**

**Richard W. Sprott  
Executive Secretary  
Utah Air Quality Board**

## *Abstract*

***Rocky Mountain Pipeline Systems, LLC, operates a storage tank located in a remote area in Summit County. The County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants. The company has requested to modify DAQE-AN0677001-03 to construct and operate a new crude oil storage tank at the facility. The new tank is subject to 40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984. Title V of the 1990 Clean Air Act applies to this source. The new tank will generate 1.15 tpy of VOC and 0.12 tpy of HAPs. The increase in emissions, in tons per year, will result in the following potential to emit totals: VOC = 4.96 and HAPs = 0.50.***

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Summit County Bee on March 12, 2004. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

### **General Conditions:**

1. This Approval Order (AO) applies to the following company:

#### Site Office

Rocky Mountain Pipeline System, LLC  
1575 Highway 150 South, Suite E  
Evanston, WY 82930

#### Corporate Office Location

Rocky Mountain Pipeline System, LLC  
555 17<sup>th</sup> Street, Suite 2400  
Denver, CO 80202

Phone Number (307) 783-8336

(303) 299-1404

Fax Number (307) 789-8182

(303) 299-1424

The equipment listed in this AO shall be operated at the following location:

Remote location – Summit County

From Interstate 80, exit 193, travel eastward on the unimproved road approximately one mile. Turn north and travel approximately 3.7 miles to the storage tanks. The tanks are roughly 360 feet east of Interstate 80 and 0.5 miles west of the Utah-Wyoming border.

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27  
4,565.56 kilometers Northing, 494.20 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO or in applicable NSPS, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the following minimum periods:
  - A. Emission inventories      Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
  - B. All other records              Two years
6. Rocky Mountain Pipeline System shall construct and operate the new internal floating roof storage tank and shall conduct its operations of the existing storage tank in accordance with the terms and conditions of this AO, which was written pursuant to Rocky Mountain Pipeline System's Notice of Intent submitted to the Division of Air Quality (DAQ) on February 11, 2004.
7. This AO shall replace the AO (DAQE-AN0677001-03) dated September 22, 2003.
8. The approved installations shall consist of the following equipment or equivalent\*:
  - A. One (1) Storage Tank
 

Service:	Crude oil
Capacity:	3,463,581 gallons
  - B. One (1) Internal Floating Roof Storage Tank
 

Service:	Crude oil
Capacity:	3,594,738 gallons

\* Equivalency shall be determined by the Executive Secretary.

9. Rocky Mountain Pipeline System shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #8.B has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If construction and/or installation have not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the

construction and/or installation. At that time, the Executive Secretary shall require documentation of the continuous construction and/or installation of the operation and may revoke the AO in accordance with R307-401-11.

### **Limitations and Tests Procedures**

10. No visible emissions shall be observed from the storage tanks. Opacity shall be determined by conducting observations in accordance with 40 CFR 60.11(b) and 40 CFR 60, Appendix A, Method 9.
11. The following production limits shall not be exceeded:
  - A. 613,000,000 gallons of crude oil throughput per rolling 12-month period for the tank in 8.A
  - B. 155,000,000 gallons of crude oil throughput per rolling 12-month period for the tank in 8.B

To determine compliance with a rolling 12-month total the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of crude oil throughput shall be kept for all periods when the plant is in operation. Crude oil throughput shall be determined by examination of the facility's acquisition and transfer records, and/or customer billing receipts. The records of crude oil throughput shall be kept on a monthly basis.

### **Federal Limitations and Requirements**

12. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, New Source Performance Standards Subpart A, 40 CFR 60.1 to 60.18 and Subpart Ka, 40 CFR 60.110a to 60.115a (Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After May 18, 1978, and Prior to July 23, 1984) apply to the tank in 8.A; New Source Performance Standards Subpart A, 40 CFR 60.1 to 60.18 and Subpart Kb, 40 CFR 60.110b to 60.117b, (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984) apply to the tank in 8.B.

### **Records & Miscellaneous**

13. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.

14. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
15. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include the two storage tanks. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for Rocky Mountain Pipeline System are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	VOC.....	4.96
B.	Total HAPs .....	0.50

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager  
New Source Review Section